

COHEN, LaBARBERA & LANDRIGAN, LLP
ATTORNEYS AT LAW

RONALD J. COHEN, EQUITY PARTNER (NY BAR & LL.M. IN TAXATION)
STEPHEN P. LABARBERA, EQUITY PARTNER (NY BAR)
THOMAS C. LANDRIGAN, EQUITY PARTNER (NY & NJ BAR & LL.M. IN TAXATION)

99 BROOKSIDE AVENUE
CHESTER, NY 10918
TELEPHONE (845) 291-1900

OXANA LUKINA, PARTNER (NY BAR & LL.M. IN TAXATION)
JENNIFER T. MULLEADY, PARTNER (NY BAR)
KYLE SEISS, PARTNER (NY & NJ BAR)

EMAIL: tlandrigan@cll-law.com
*Not for Service of Process

ATHENA LI (NY & TX BAR & LL.M. IN TAXATION)
MELISSA A. PERRY (NY BAR)
CHRISTOPHER SMITH, SENIOR COUNSEL (NY BAR & LL.M. IN TAXATION)

PHILLIP C. LANDRIGAN (NY BAR – OF COUNSEL)

December 15, 2025

Via ECF

Honorable Cathy Seibel, U.S.D.J.
Hon. Charles L. Brieant Jr. Federal Building
300 Quarropas St.
White Plains, NY 10601-4150

Re: Martin Soudani a/k/a Moutaz Soudani v. Mout'z Soudani et al.,
Case No. 25-cv-00176 (CS)

Dear Judge Seibel:

We have just been retained by the Defendant Mout'z Soudani in the above referenced matter.

We write to request an adjournment of the briefing schedule and hearing date set forth in your Honor's Order of January 13, 2025 to allow our client ample to time to make appropriate submissions and prepare for any hearing to avoid prejudice regarding the instant dispute centering around the wealth our 76 year old client created from a lifetime of effort now subject of a family trusts and estates dispute where our client has been a trustee for over 20 years where his nephew/Plaintiff now claims after pleading under oath to larceny himself that it was his uncle who "stole" monies in which the applicable documents reflect our client has the rights to principal and interest during his lifetime to allow for dignity during his retirement.

We further request this time given that since yesterday afternoon (even before our formally being retained) we have been in active good faith discussion with multiple attorneys for the Plaintiff to put forth responses to attempts at a global resolution of all family disputes. Likewise, we are conferring with our client as to a recent proposal of Plaintiff's counsel as to resolving the motion/hearing in whole or in part that requires further focus and discussion to determine whether same is appropriate for all parties interests in good faith.

Finally, we have been advised via email that the U.S. Attorney's office will be requesting a stay of these proceedings as an intervenor which may as a practical matter require parsing through various items in the event that any hearing were to continue in whole or in part.

Under these circumstances, we respectfully request that additional time be granted.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Landrigan', written over a horizontal line.

Thomas C. Landrigan